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April 20, 2023

The Honorable Ann M. Donnelly
United States District Judge
225 Cadman Plaza East
Brooklyn, New York 11201

Re: United States v. Douglass Mackey, Criminal Docket No. 21-0080 (AMD)

Dear Judge Donnelly:

Upon consultation with the government and obtaining its consent, I write to respectfully request an adjustment for briefing of post-verdict motions, as follows:

May 3	Mr. Mackey's motions;
May 31	The government's response;
June 14	Mr. Mackey's reply.

I make this request because I lost a week of work due to illness since trial and have a fact-finding hearing and out-of-town trip next week and a sentencing on May 1, 2023. As a result, I cannot realistically complete my work either as scheduled (by tomorrow) nor by next week.

I appreciate the Court's consideration.

Respectfully submitted,

/s/ Andrew J. Frisch
Andrew J. Frisch

cc: U.S. Attorney's Office